Tronsen v. Toledo-Lucas County Public Library Doc. 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT of OHIO Sitting at Toledo, Ohio

anders tronsen
Plaintiff,

vs.

The TOLEDO-LUCAS COUNTY PUBLIC LIBRARY

(herein after as TLCPL)

3:08CV148

CLERK U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO TOLEDO
2008 JAN 17 PM 2:24

COMPLAINT

regarding abrogation of Plaintiff's FIRST AMMENDMENT RIGHTS due to actions of the Defendants.

PLAINTIFF SEEKS IMMEDIATE INJUNCTIVE RELIEF **and SUMMARY JUDGMENT**

JUDGE JAMES G. CARR

I. PARTIES

PLAINTIFF (mark) anders tronsen is a married (legally separated) man who files this action for and on his own behalf. Plaintiff, at all times relevant to this action, was a citizen and registered voter in Lucas County, Ohio.

DEFENDANT The TOLEDO-LUCAS COUNTY PUBLIC LIBRARY is a legally constituted governmental body governed by a Board of Directors elected by the citizens of Lucas County, Ohio.

II. FACTS

2.1 On or about December 31, 2007, Plaintiff anders tronsen was unceremoniously EJECTED from the Main Branch of the TLCPL in full view of his friend & acquaintance, Mr. Donald Beachey... with the aid and assistance of members of the Toledo Police Department. Plaintiff was embarrassed and felt a great indignity to his person upon being forced to leave the library for so slight an infraction as the Defendant alleges.

2.2 This is not the first time the Plaintiff has suffered a similar penalty-consequence for similar protected conduct; the action subject of this lawsuit is of a repeated, continuing nature.

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III ALLEGATIONS OF CONTROLLING LAW

Plaintiff alleges as following:

1. That Plaintiff does not cede, waive, or otherwise surrender his state AND Federal Constitutional Rights, privileges, protections or immunities at the library door.
2. Plaintiff says he, even if the conduct Defendant alleges were true, was violated in the exercise of his rightful First Amendment freedoms (freedom of speech-expression); further that this action constitutes a violation of the Ohio State constitution, Article 1, section 11.
3. That the "Library code of conduct" or any alleged application thereof is and MUST remain subordinate to the principles and protections afforded citizens under the terms of the Constitution of the United States of America, AND the constitution of the state of Ohio, as interpreted, and explained by legally constituted courts.

IV PRAYER FOR RELIEF

Plaintiff therefore prays for Relief in the following forms:

1. **Plaintiff asks that an IMMEDIATE Injunction allowing him 'usual and customary' access to the Defendant's premises and privileges of borrowing materials from the defendant be GRANTED.**
2. For Compensatory and Punitive damages to be paid to Plaintiff, in the amount proved at time of trial.

3. Plaintiff asks that Defendants be required – obligated to provide a legal education for Plaintiff in the following manner:

   a) A 'free ride' scholarship to the University of Toledo Law School, starting with the next following beginning class of students, including 100% of: Being funded or reimbursed (at Plaintiff's option) for the following:

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b) Tuition, books and supplies, miscellaneous costs and fees
c) Plaintiff be granted Admission to the University of Toledo Law School.
d) Cost of transportation
e) Room and board at Plaintiff's choice of accommodation.

All the above to be done in a reasonable manner and cost, Not exorbitant or extreme in nature and/or amount.

4.What ever adequate, just, and good compensation this Honorable Court shall determine so as to promote justice.

5. Plaintiff asks that his attorney fees and costs be reimbursed regarding this matter.

mark anders tronsen
1/17/08

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